## IN THE UNITED STATES DISTRICT COURT 180500-ORE

## FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA, )	
Plaintiff, )	Case No. CR 06- 600 31- AA
v. )  MATTHEW ALLEN GALEN )	INFORMATION
PENCE, ) Defendant. )	[18 U.S.C. § 1028A; 18 U.S.C. § 1344(2)]

## THE UNITED STATES ATTORNEY CHARGES:

## COUNT 1 [AGGRAVATED IDENTITY THEFT]

Beginning at an undetermined time and continuing through December 22, 2005, in the District of Oregon, defendant Matthew Allen Galen Pence, knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person during and in relation to a federal felony enumerated in Title 18, United States Code, Section 1028A(c), to wit, bank fraud, a violation of Title 18, United States Code, Section 1344(2), in that defendant Matthew Allen Galen Pence, knowingly transferred, possessed and used means of identification of other persons in carrying out a scheme and artifice to obtain money and property owned by, or under the custody or control of, financial institutions whose deposits were then insured by the Federal Deposit Insurance Corporation and the National Credit Union Administration, by means of false and fraudulent pretenses and representations which were material, in that they would reasonably influence a bank to part with money or property, to wit, representing that he was the lawful owner of fraudulently

obtained checks, well knowing at the time that these pretenses and representations would be and were false and fraudulent when made; all in violation of Title 18, United States Code, Section 1028A.

Dated this \_\_\_\_\_ day of April, 2006.

KARIN J. IMMERGUT United States Attorney

SEAN B. HOAR

Assistant United States Attorney